IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH DAKOTA **EASTERN DIVISION**

United States of America,

Plaintiff,

DEFENDANT'S MOTION TO CONTINUE JURY TRIAL

Case No.: 3:24-CR-00061

VS.

Jesus Amurahaby Celestin-Ortega,

Defendant.

- **COMES NOW**, the Defendant Jesus Amurahaby Celestin-Ortega, by and through his $[\P 1]$ attorney of record, hereby moves this Court for an Order continuing the jury trial in the abovecaptioned matter, based on the following:
- [¶ 2] A jury trial is presently scheduled for August 19, 2025.
- Counsel for Defendant was appointed on July 3, 2025. [¶ 3]
- Undersigned counsel has not yet received discovery. It is counsel's understanding that [¶ 4] discovery in this matter is voluminous, and the matter has been designated as a Complex Case. Counsel and Defendant need adequate time to review discovery, confer regarding this matter, and conduct plea negotiations with the Government.
- [¶ 5] Undersigned counsel has spoken to AUSA Matthew Kopp and the Government has no objection to this continuance request.
- [96]Undersigned counsel has spoken with Defendant, Jesus Amurahaby Celestin-Ortega, and he does not object to this continuance request.
- This request is not made for undue delay or any other improper reason. [¶ 7]
- [¶ 8] WHEREFORE, Defendant, Jesus Amurahaby Celestin-Ortega, respectfully

requests to continue the Jury Trial currently scheduled for August 19, 2025, to allow sufficient time for discovery review, investigation, and negotiations.

[¶ 9] Dated this July 09, 2025.

Respectfully submitted,

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